

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

UNITED STATES OF AMERICA

VERSUS

TIMOTHY PREJEAN

\* CRIMINAL NO. *6:15-cr-00014-01*  
\* 18 U.S.C. § 1951  
\* 18 U.S.C. § 1030  
\* 18 U.S.C. § 1001  
\*

JUDGE HAIK

MAGISTRATE JUDGE HILL

INDICTMENT

THE FEDERAL GRAND JURY CHARGES:

COUNT 1

**Interference with Commerce by Extortion  
Under Color of Official Right**

18 U.S.C. § 1951

A. AT ALL TIMES MATERIAL HEREIN:

1. The Carencro Police Department was tasked by local ordinance to regulate exotic dancers within the City of Carencro, by issuing permits to individuals who apply for an exotic dancer permit, and by enforcing related restrictions, ordinances and laws.

2. TIMOTHY PREJEAN worked as a law enforcement officer with the Carencro Police Department, located in Carencro, Louisiana.

3. James Panos, alias “Jim,” and Jennifer Panos, alias “Nancy,” were owners and operators of Desperados of Acadiana, Incorporated, which operated as Desperado’s Gentlemen’s Cabaret (hereinafter “Desperado’s”), located at 3730 N.E. Evangeline Thruway, Carencro, Louisiana.

4. Desperado’s was a business engaged in interstate commerce, which included, but was not limited to, activity of customers traveling in interstate commerce, alcohol sales and other goods and services that traveled in interstate commerce, credit card and check transactions that caused wire signals in interstate commerce, and advertisement on the internet.

5. Except when temporarily assigned to other law enforcement duties, TIMOTHY PREJEAN, was a designated person who managed the issuance of exotic dancer permits for the Carencro Police Department.

6. TIMOTHY PREJEAN managed the process of receiving applications, issuing and revoking permits, and enforcing ordinances with respect to exotic dancers who worked at Desperado’s.

7. As part of his duties and responsibility in managing the issuance of exotic dancer permits for employees of Desperado’s, TIMOTHY PREJEAN visited Desperado’s on a regular basis.

#### B. EXTORTION UNDER COLOR OF OFFICIAL RIGHT

Beginning on or about the 1<sup>st</sup> day of January, 2007, and continuing until the 5<sup>th</sup> day of December, 2012, in the Western District of Louisiana and

elsewhere, the defendant, TIMOTHY PREJEAN, while employed as an officer with the Carencro Police Department, did knowingly obstruct, delay and affect in any way and degree, commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951; that is, the defendant under color of official right obtained property and benefits not due the defendant, or his office, from James and Jennifer Panos and employees of Desperado's, with the consent of James and Jennifer Panos and employees of Desperado's, all in violation of Title 18, United States Code, Section 1951. [18 U.S.C. § 1951]

## **COUNT 2**

### **Obtaining Information from a Government or Protected Computer**

18 U.S.C. §§ 1030(a)(2), (c)(2)(B)(i) and (c)(2)(B)(ii)

On or about the 16<sup>th</sup> day of March, 2012, in the Western District of Louisiana and elsewhere, the defendant, TIMOTHY PREJEAN, intentionally exceeded authorized access to a computer, and thereby obtained information from a department and agency of the United States, and from a protected computer, and the offense was committed for private financial gain, and in furtherance of a criminal and tortious act in violation of the Constitution and laws of the United States, all in violation of Title 18, United States Code,

Sections 1030(a)(2), (c)(2)(B)(i) and (c)(2)(B)(ii). [18 U.S.C. §§ 1030(a)(2), (c)(2)(B)(i) and (c)(2)(B)(ii)]

**COUNT 3**

**False Statement or Representation Made  
to a Department or Agency of the United States**

18 U.S.C. § 1001(a)(2)

On or about the 20<sup>th</sup> day of May, 2013, the defendant, TIMOTHY PREJEAN, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the Federal Bureau of Investigation (FBI) and Drug Enforcement Agency (DEA) by TIMOTHY PREJEAN's statements and representations that:

TIMOTHY PREJEAN did not have any knowledge, aside from security detail wages, of any Carencro Police Officer accepting extra cash payments, or extra money for a vacation, from Desperado's or James Panos or Jennifer Panos, prior to Desperado's being shutdown,

with said statements and representations being made at the United States Attorney's Office, Lafayette, Louisiana, in the Western District of Louisiana. The statements and representations were false because, as TIMOTHY PREJEAN then and there knew, in addition to off-duty security detail wages, TIMOTHY

PREJEAN himself accepted regular cash payments from Desperado's, James and Jennifer Panos, and TIMOTHY PREJEAN accepted extra money for a vacation and personal expenses from Desperado's, James and Jennifer Panos, all in violation of Title 18, United States Code, Section 1001(a)(2). [18 U.S.C. § 1001(a)(2)]

**COUNT 4**

**False Statement or Representation Made  
to a Department or Agency of the United States**

18 U.S.C. § 1001(a)(2)

On or about the 16<sup>th</sup> day of August, 2013, the defendant, TIMOTHY PREJEAN, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the Federal Bureau of Investigation (FBI) and Drug Enforcement Agency (DEA) by TIMOTHY PREJEAN's statements and representations that:

TIMOTHY PREJEAN denied running a criminal history of James Panos on March 16, 2012, at James Panos' request, and TIMOTHY PREJEAN further stated and represented that he ran the criminal history to track a stolen vehicle, and TIMOTHY PREJEAN

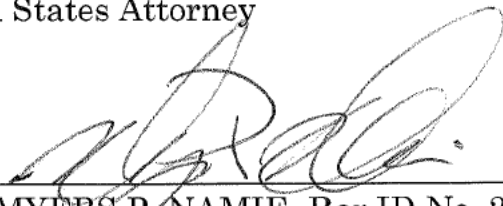
further stated that he ran the criminal history at the request of "Nancy" (Jennifer Panos), with said statements and representations being made at the United States Attorney's Office, Lafayette, Louisiana, in the Western District of Louisiana. The statements and representations were false because, as TIMOTHY PREJEAN then and there knew, TIMOTHY PREJEAN ran the criminal history for James Panos at the request of James Panos, all in violation of Title 18, United States Code, Section 1001(a)(2). [18 U.S.C. § 1001(a)(2)]

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON, FEDERAL GRAND JURY

STEPHANIE A. FINLEY  
United States Attorney

By:

  
\_\_\_\_\_  
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